

# EXHIBIT D

**Exhibit D to the Greenbaum Declaration**

| <b>Document Title/ECF No.</b>                            | <b>Basis for Sealing</b>   | <b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>   | <b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>   | <b>Any Prior Order Sealing the Same Materials in the Pending Action</b>      | <b>Party in Opposition to Sealing, if any, and Basis</b> |
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| Exhibit 1 to Letter dated November 7, 2024 [ECF No. 443] | Exhibit 1 is a letter motion dated May 2, 2024 that was previously the subject of a motion to seal, ECF No 360, <i>see also</i> ECF No. 375 (granting motion to seal). Exhibit 1 contains a reference to (1) an allegation made by Johnson & Johnson Healthcare Systems Inc. (“J&J”) about Save On SP, LLC’s (“SaveOn”) business strategy, the basis for which J&J learned during discovery from SaveOn’s internal emails, and (2) an email produced during discovery from a SaveOn employee discussing SaveOn’s business strategy, both comprising proprietary business | If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. | A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information. | Yes, <i>see</i> ECF No. 375; <i>see also</i> ECF No. 418 (redacted version). | No objection   |

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|  | information. <i>See</i> ECF No. 443 Ex. 1.  |  |   |  |              |
| Exhibit 3 to Letter dated November 7, 2024 [ECF No. 443] | Exhibit 3 is a letter motion dated May 9, 2024 that was previously the subject of a motion to seal, ECF No 360, <i>see also</i> ECF No. 375 (granting motion to seal). Exhibit 3 contains discussion of SaveOn's business model and financial relationship with its clients, comprising proprietary business information. <i>See</i> ECF No. 443 Ex. 3. | If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. | A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.     | Yes, <i>see</i> ECF No. 375; <i>see also</i> ECF No. 418 (redacted version). | No objection |
| Exhibit 4 to Letter dated November 7, 2024 [ECF No. 443] | Exhibit 4 is a transcript of a hearing held in front of Judge Wolfson on May 23, 2024 concerning multiple discovery motions between SaveOn and J&J. The transcript contains discussion of SaveOn's business practices and revenue, disclosed to J&J during discovery and comprising confidential business information. <i>See</i> ECF No. 443 Ex. 4.    | If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. | A redacted, public version of the transcript is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information. | No.  | No objection |

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| Exhibit 6 to Letter dated November 7, 2024 [ECF No. 443] | Exhibit 6 is a transcript of a hearing held in front of Judge Wolfson on April 3, 2024 concerning multiple discovery motions between SaveOn and J&J. The transcript contains discussion of SaveOn's internal confidentiality policy and practices for enforcing it, comprising confidential business information. <i>See</i> ECF No. 443 Ex. 6. | If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants. | A redacted, public version of the transcript is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information. | No. | No objection |
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